

Mr. Victor Cole  
U.S. Department of Agriculture  
Natural Resources Conservation Service  
Financial Assistance Programs Division  
PO Box 2890  
Washington, DC 20013

Dear Mr. Cole:

The Environmental Protection Agency (EPA) has reviewed the Natural Resources Conservation Service's (NRCS) Final Programmatic Environmental Impact Statement (PEIS) for the Emergency Watershed Protection Program (EWP). Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act (CAA).

EPA's comments on the earlier Draft PEIS supported the proposed efforts by the NRCS to improve implementation of the EWP (Alternative 2 - "EWP Program Improvement and Expansion"), recognizing that the proposed changes would minimize adverse environmental impacts and allow for more environmentally appropriate responses to watershed impairments. EPA also suggested that Alternative 3 ("Prioritized Watershed Planning and Management"), as described in the Draft PEIS, would be environmentally preferable given its focus on watershed management approaches.

We appreciate the responses to our comments in the Final PEIS, and understand that although Alternative 3 was not selected, NRCS will be working to better integrate management of its watershed programs. We do remain concerned, however, that Element 10 ("Eligible Restoration Methods") of the Preferred Alternative continues to use a criterion of "least-cost" when deciding whether to "apply the principles of natural stream dynamics and bioengineering to the design of EWP restoration." It is not clear why this criterion is included given the statements in the Final PEIS, in response to EPA's earlier comment on this issue, that NRCS has "changed its basic approach to approval of EWP work" and that the term "least-cost" has been eliminated (see "Comment Responses - 4"). We appreciate NRCS's responses on this issue and suggest that Element 10 of the Preferred Alternative be made consistent with those responses.

If you have any questions regarding our comments on the Final PEIS, please call me or Cliff Rader of my staff at (202) 564-7159.

Sincerely,

/s/

Anne Norton Miller  
Director  
Office of Federal Activities